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ALLSTATE INSURANCE COMPANY and ALLSTATE FINANCIAL SERVICES, LLC CORPORATE DO NOT CALL AND NO FAX SOLICITATION POLICIES

When placing **any** telephone calls for Allstate or any Allstate affiliated brands, employees and agencies must comply with Allstate's Corporate Do Not Call and No Fax Solicitation Policies and all applicable state and federal laws and regulations regarding telephone calls. Business units and agency owners should ensure that external suppliers comply with the Allstate Corporate DNC Policy and applicable state and federal laws and regulations.

The rules and regulations pertaining to Allstate's Corporate Do Not Call Policy apply to outbound telephone solicitations to both existing policyholders and non-policyholders, and to certain service and transactional calls made to existing policyholders.

Agencies must provide, upon request from a consumer or customer, a copy of Allstate's Corporate Do Not Call and No Fax Solicitation Policy and must document that the policy was provided.

THE ALLSTATE CORPORATE DO NOT CALL POLICY

1. Do not initiate a telephone call to phone numbers on the Allstate Do Not Call list for the purpose of encouraging the purchase of products or services, unless a consumer or customer on the Allstate Do Not Call list has made an inquiry about a product or service as evidenced by an express written invitation or consent to call the person and phone number. The inquiry must be properly documented in the consumer or customer file.

It is permissible to reply to an inquiry by returning a phone call to the consumer or customer within three (3) months of the initial inquiry date, however the number should be scrubbed at least monthly following the initial inquiry to identify a possible new Do Not Call request. If calling pursuant to an inquiry, documentation for the consumer or customer inquiry should include the phone number to which calls will be placed, and the date consent was granted. (**Note:** Individual states may have more restrictive requirements in regard to an inquiry about a product or service.)

An agency should use available Allstate-provided resources to determine if a consumer or customer number is on the Allstate Do Not Call list.

- 2. When making a telephone solicitation, provide the called party with the name of the individual making the call, the name of the person or business on whose behalf the call is being made, the purpose of the call, the products or services that are the subject of the call, and a telephone number or address at which the person or business may be contacted. The telephone number provided may not be a 900 number or any other number for which charges exceed local or long-distance transmission charges.
- 3. Do not make telephone solicitations to a residence before 8:00 AM or after 9:00 PM local time of the residence. (**Note:** Individual states may have more restrictive limitations on when solicitation telephone calls are permissible.)
- 4. Discontinue a solicitation if the person being solicited states that he/she is not interested in the solicitation at any time during the telephone call.
- 5. When a consumer or customer states that he/she does not wish to receive any future telephone calls from Allstate:
 - (a) Acknowledge the person's Do Not Call request and indicate that Allstate will take steps to comply with it.
 - (b) Inform the individual that:
 - i. It may take up to thirty (30) days before the request can be communicated to other Allstate offices and system records are updated. Also, inform the individual that if a change in telephone number should occur, the person should contact Allstate if he/she wants the new number to be put on the Allstate Do Not Call list. The change may take up to thirty (30) days before it can be communicated to other Allstate offices and system records are updated; and
 - ii. Numbers do not remain on the Allstate Do Not Call list indefinitely unless required by law; Allstate honors Do Not Call requests for the length of time pursuant to federal and state laws and regulations

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- (e.g., five years from the date the request is made per federal requirements; ten years per some state requirements).
- (c) Within one (1) business day from the date of the request, process the Do Not Call request via the approved methods. All information must be accurate and complete.
- 6. Take the following actions for all apparent reassigned telephone numbers: Add a number to the Allstate Do Not Call list within one (1) business day when there is a reasonable belief the number has changed or been disconnected (e.g., a recording states the call failed due to number change or disconnection, the caller hears "fast busy" or triple tones) or when it appears the number has been reassigned (e.g., call recipient reports caller reached the wrong number). Update other customer and consumer records accordingly.
- 7. Ensure all persons engaged in both outbound and inbound call activities on behalf of Allstate are educated on the Allstate Corporate Do Not Call Policy and procedures and the use of the Allstate Do Not Call list. Completion of Allstate's online corporate contact compliance course is strongly recommended.
- 8. Business to business calls (e.g., telemarketing for commercial policy prospecting efforts, agency recruiting calls) are subject to certain Federal Communications Commission (FCC) rules. All business to business calls should follow FCC Telephone Consumer Protection Act (TCPA) rules for dialing wireless numbers (including Voice over Internet Protocol numbers) as well as for placing robocalls to cell or landline numbers. In addition, it is Allstate's corporate position that **all** business to business telephone numbers to be called should be scrubbed against the Allstate Do Not Call list and if the number appears on the Allstate Do Not Call list, then no telephone call should be made.
- 9. Do not make telephone calls to any:
 - (a) Emergency telephone line, including any 911 line and any emergency line of a hospital, medical physician or service office, health care facility, poison control center, or fire protection, or law enforcement agency; or
 - (b) Telephone line of any guest room or patient room of a hospital, health care facility, elderly home or similar establishment.
- 10. Sales calls to any customer or consumer wireless number (including VoIP numbers) using an automatic telephone dialing system (ATDS) require the prior express written consent of the called party. Service and/or informational calls to any wireless and VoIP number using an ATDS require prior express consent. Prior express written consent must be obtained when using an artificial or prerecorded voice to any customer wireless/VoIP or landline telephone number. A live, 10-digit manually dialed call to a wireless or VoIP number is not subject to these rules.
 - (a) Allstate prohibits its agents from placing any form of artificial voice or prerecorded messages whether sales or service/informational (including use of ringless/direct-to-voicemail technology). This prohibition exists regardless of whether an agent has obtained the recipient's prior written consent.
 - (b) A customer or consumer may revoke their consent to receive calls on their wireless or VoIP number at any time and by any reasonable means. Wireless and VoIP numbers should be scrubbed against the Allstate-specific Do Not Call list to determine if consent has been revoked or if a phone number has been added to the Allstate-specific Do Not Call list.
- 11. Text messages, such as short message service (SMS), are considered calls to wireless (mobile phone) numbers, therefore, text messages containing solicitations may not be sent without prior express **written** consent. Informational and service-related text messages still require prior express consent. See the <u>Allstate Corporate Texting Policy</u> for all requirements, including opt-in consent requirements and texting provider requirements.
- 12. Only specific, Corporate-approved and executed **prerecorded messages** are permitted. All prerecorded telephone messages, whether to wireless and VoIP numbers or landline phone numbers, must adhere to the following:
 - (a) **Prospects:** Prerecorded messages are not permitted to be placed, at any time, without prior express **written** consent from the person being called.
 - (b) Existing Customers:

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- Prerecorded solicitation messages require the prior express written consent of the recipient to receive such calls.
- ii. Prerecorded **service and/or informational messages** require the prior **express** consent of the recipient to receive such messages.
- (c) Allow the individual's telephone to ring for at least fifteen (15) seconds or four (4) rings before an unanswered call is disconnected.
- (d) Begin the prerecorded message within two (2) seconds of the greeting of the person called.
- (e) A customer may revoke their consent to receive artificial voice or prerecorded calls at any time and by any reasonable means. Customer wireless and landline numbers should be scrubbed against the Allstatespecific Do Not Call list to determine if consent has been revoked or if a phone number has been added to the Allstate-specific Do Not Call list.
- (f) Use of ringless/direct-to-voicemail technology is not permitted.
- 13. Do not use an automatic dialing system in such a way that two or more telephone lines of a multi-line business are engaged at the same time.
- 14. If using an automatic dialing device or artificial or prerecorded message, disconnect the device from the telephone wire within five (5) seconds of the termination of the call by the person being called.
- 15. Do not block Caller ID.
- 16. Any person that engages in placing telephone calls must transmit Caller ID information, which includes either the Calling Party Number (CPN) or Automatic Number Identification (ANI), and when available by the telephone carrier, the name of the person, business or entity that engages in placing calls. The telephone number provided must permit individuals to make a Do Not Call request during regular business hours.
- 17. When making telephone calls, agencies must ensure that all calls are not disconnected prior to fifteen (15) seconds or four (4) rings.
- 18. If using an autodialer or a predictive dialer when making telephone calls, no more than three percent (3%) of calls answered by a consumer can be "abandoned", as measured over a 30-day period. A call is abandoned if it is not connected to a live person within two (2) seconds of the called person's completed greeting. Records (e.g., dialer reports) must be maintained to document compliance.
 - (a) Whenever a live person is not available to speak with the person answering a solicitation call, that person must receive, within two (2) seconds after the called person's completed greeting, a prerecorded identification message that only states the name and telephone number of the business, entity or other individual on whose behalf the call was placed and that the call was for "telemarketing purposes only".
 - i. The telephone number provided may not be a 900 number or any other number for which charges exceed local or long-distance transmission charges; and must permit an individual to make a Do Not Call request during regular business hours.
 - ii. There must be an automated, interactive voice and/or key press activated opt-out mechanism that enables the called person to make a do not call request during the duration of the abandoned call message. The mechanism must automatically add the called person's number to the Allstate Do Not Call List, and then immediately terminate the call. This is required for all abandoned call recorded messages for telemarketing sales calls, whether placed to prospects or customers, and for calls to residential phone lines as well as wireless numbers.

19. Record Retention Requirements (48 months):

The FTC and certain other regulatory agencies require that specific business records related to outbound calls be retained to demonstrate compliance. Call records pertaining to outbound calls (telesales or service) should be retained for a **minimum of four years**.

THE ALLSTATE CORPORATE NO FAX SOLICITATION POLICY

Agencies are strictly prohibited from utilizing fax transmissions to solicit customers or prospects via their residential or business fax numbers to purchase products or services through Allstate. This prohibition exists regardless of whether an agency has obtained the recipient's prior express written consent.